

REMARKS

This responds to the Office Action mailed on July 17, 2006.

No claims are amended, canceled, or added; as a result, claims 1-30 are now pending in this application.

As an initial matter, Applicants traverse the statement repeatedly made in the Office Action that “XP-001103127 discloses essentially all the claimed invention as set fourth in the instant application” (sic). Applicants respectfully submit that this conclusory statement is not supported by any reasoning or evidence in the Office Action.

Further, applicants note that for each claim, the office action cites entire sections of the XP-001103127 reference for support. As an example, in the discussion of claim 1, the office action states that the claim language “reads on page 1 the introduction.” Also for example, in the discussion of claim 3, the office action states that the claim language “reads on the entire document.” Applicants respectfully submit that these citations lack sufficient specificity, and that rejections predicated thereon should be withdrawn. See 37 CFR 1.104(c)(2) “When a reference is complex or shows or describes inventions other than that claimed by the applicant, *the particular part relied on must be designated as nearly as practicable.*” [Emphasis Added].

§103 Rejection of the Claims

Claims 1-30 were rejected under 35 USC § 103(a) as being unpatentable over XP-001103127 (Dong-Jun Lee, et al “*on Optimum Timer Value of Area and Timer-Based Location Registration Scheme*”, April 2001, IEEE Communications letters Vol. 5, Number 4, pages 1-3.). in view of Rudrapatna et al. (U.S. Patent Number 6,052,598).

Applicants respectfully traverse this rejection on the grounds that a *prima facie* case of obviousness has not been established. Applicants respectfully submit that a proper *prima facie* case of obviousness has not been established because the combination of references does not disclose, teach, or suggest the subject matter of the claims.

The combination of references does not disclose, teach, or suggest the claimed invention

The Lee reference describes a “location registration scheme” to register the location of a mobile station in a mobile communications system. See the Abstract of Lee. Location

registration and paging are part of "location management," which is required to connect incoming calls to mobile stations. See the first paragraph of 1. Introduction of Lee.

The Rudrapatna reference describes measuring signal strength at a cell base station and neighboring cell base stations to determine the location, velocity, and direction of a mobile station. See the Abstract of Rudrapatna. The cited portion of Rudrapatna (column 1, lines 60-67, and column 2, lines 1-40) further discuss determining the location, velocity, and direction of a mobile station to "anticipate cell handover needs."

Applicants respectfully submit that the cited references do not disclose, teach, or suggest the subject matter of independent claim 1, including for example, "setting a timer to delay a roaming attempt by the wireless network client." "Roaming" and "roaming attempts" are described in the application as filed, and in the previous office action reply. Neither of the cited references describe roaming attempts by a wireless network client, or the delay of a roaming attempt by a wireless client.

Applicants respectfully submit that the cited references do not disclose, teach, or suggest the subject matter of independent claim 7, including for example, "wherein the mobile station attempts to roam after the timer expires."

Applicants respectfully submit that the cited references do not disclose, teach, or suggest the subject matter of independent claims 14, 21, 25, and 28, including for example "attempting to roam when the timer expires."

The remaining claims further define over the references of record, and are believed to be in conditional for allowance at least by virtue of dependency.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (952-473-8800) to facilitate prosecution of this application.

Respectfully submitted,

JAYA L JEYASEELAN ET AL.

By their Representatives,

Customer Number: 45445

Telephone Number: 952-473-8800

Date September 18, 2006

By Dana B. LeMoine
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 18 day of September, 2006.

Kyrstin Ryan

Name

Kyrstin Ryan
Signature